IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF DELAWARE

SALLY CANNON, On Behalf of Herself and All Others Similarly Situated,
 	
                Plaintiff,
 	
      v.
 	
MBNA CORPORATION, PENSION & 401K PLAN COMMITTEE of MBNA CORPORATION, LANCE L. WEAVER, VERNON H.C. WRIGHT, RANDOLPH D. LERNER, BRUCE L. HAMMONDS, JAMES H. BERICK, BENJAMIN R. CIVILETTI, WILLIAM L. JEWS, STUART L. MARKOWITZ, WILLIAM B. MILSTEAD, JOHN COCHRAN, THOMAS G. MURDOUGH, Jr. and DWIGHT ASSET MANAGEMENT COMPANY,
 	
                Defendants.
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	) C.A. No. 05-429 (GMS)
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[PROPOSED] ORDER OF CONSOLIDATION AND APPOINTMENT OF INTERIM COUNSEL AND LIAISON COUNSEL AND EXECUTIVE COMMITTEE IN THE ERISA LITIGATION

Having considered the motion of plaintiff Sally Cannon for consolidation and appointment of interim class counsel, interim liaison counsel, and an executive committee to act on behalf of the putative class, as well as the memorandum of law and accompanying declarations filed in support thereof, and good cause appearing therefor,

IT IS HEREBY ORDERED as follows:

1.   Any related ERISA cases that are subsequently-filed or removed or transferred to this Court will be consolidated, on notice, with the instant action.

2.   All consolidated actions will proceed under the following caption, utilizing the docket number from the instant action:

In re MBNA Corp. ERISA Litigation	Master Docket No. 05-429 (GMS)

3.   The law firm of Wolf Haldenstein Adler Freeman & Herz LLP is appointed interim counsel to act on behalf of the putative class.

4.   An executive committee of counsel shall consist of Wolf Haldenstein Adler Freeman & Herz LLP, Goodkind Labaton Rudoff & Sucharow LLP, and Gainey & McKenna.

5.   The law firm of Rosenthal, Monhait, Gross & Goddess, P.A. is appointed interim liaison counsel for the putative class.

6.   This Order is without prejudice to defendants' opportunity to object to class certification, nor to this Court's opportunity to provide full consideration to class certification when such motion is made.

_____
Untied States District Judge

Dated: _____